

# Exhibit 7

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SOLAS OLED LTD., v. DELL INC.,	<i>Plaintiff,</i>  <i>Defendant.</i>	Case No. 6:19-cv-00514-ADA
SOLAS OLED LTD., v. GOOGLE LLC,	<i>Plaintiff,</i>  <i>Defendant.</i>	Case No. 6:19-cv-00515-ADA
SOLAS OLED LTD., v. APPLE INC.,	<i>Plaintiff,</i>  <i>Defendant.</i>	Case No. 6:19-cv-00537-ADA
SOLAS OLED LTD., v. HP INC.,	<i>Plaintiff,</i>  <i>Defendant</i>	Case No. 6:19-cv-00631-ADA

**JOINT REVISED LIST OF TERMS/CONSTRUCTIONS**

Under the scheduling orders in the above-captioned cases, Plaintiff Solas OLED LTD. (“Solas”) and Defendants Dell Inc., (“Dell”), Google LLC, (“Google”), Apple Inc., (“Apple”), and HP Inc., (“HP”) met and conferred to narrow the terms in dispute and regarding a joint revised list of terms/constructions. The parties identify the following terms with agreed constructions, and

disputed terms and constructions that expect to be argued in the Parties' opening claim construction briefs. The parties reserve the right to further meet and confer, and narrow disputes consistent with the Court's orders and procedures.

#### **I. U.S. PATENT NO. 6,072,450 ("’450 PATENT")**

The ’450 patent is asserted in *Solas v. Dell* (6:19-cv-00514-ADA), *Solas v. Google* (6:19-cv-00515-ADA) and *Solas v. Apple* (6:19-cv-00537-ADA). The following terms/constructions for the ’450 patent apply only to those cases and the parties.

##### **A. Agreed Terms**

<b>Claim Term / Asserted Claim(s)</b>	<b>Agreed Construction</b>
"active elements"  (claims 1, 4)	circuit elements that have gain or that direct current flow, e.g., transistors
"light lays [sic] in a first wavelength range pass through said at least one filter selectively when incident light rays in a second wavelength range including said first wave length range enter said at least one filter"  (claim 12)	Plain and ordinary meaning. "lays [sic]" means and should be replaced with "rays"

#### **II. U.S. PATENT NO. 7,446,338 ("’338 PATENT")**

The ’338 patent is asserted in *Solas v. Google* (6:19-cv-00515-ADA) and *Solas v. Apple* (6:19-cv-00537-ADA). The following terms/constructions for the ’338 patent apply only to those cases and parties.

**A. Agreed Terms**

<b>Claim Term / Asserted Claim(s)</b>	<b>Agreed Construction</b>
“the pixel electrodes being arrayed along the interconnections between the interconnections on the surface of the transistor array substrate”  (claim 1)	the pixel electrodes are arrayed along the interconnections and located between the interconnections, and the pixel electrodes are on the surface of the transistor array substrate

**B. Disputed Terms**

<b>Claim Term / Asserted Claim(s)</b>	<b>Solas’s Construction</b>	<b>Defendants’ Construction</b>
“transistor array substrate”  (claim 1, 4)	layered structure upon which or within which a transistor array is fabricated	a layered structure composed of a bottom insulating layer through a topmost layer on whose upper surface pixel electrodes are formed, which contains an array of transistors
“project from a surface of the transistor array substrate”  (claim 1)	extend from an external surface of the transistor array substrate	extend above the upper surface of the transistor array substrate
“write current”  (claim 1)	Plain and ordinary meaning	pull-out current

**III. U.S. PATENT NO. 7,573,068 (“’068 PATENT”)**

The ’068 patent is asserted in *Solas v. Apple* (6:19-cv-00537-ADA) and *Solas v. HP* (6:19-cv-00631). The following terms/constructions for the ’068 patent apply only to those cases and parties.

**A. Agreed Terms**

<b>Claim Term / Asserted Claim(s)</b>	<b>Agreed Construction</b>
“feed interconnections”  (claims 1, 13)	conductive structures in a different layer or layers than the supply line that also provide connections to a source that supplies voltage and/or current
“patterned together [with]”  (claims 1, 13)	“patterned to fit together [with]” wherein “patterning” may consist of one of more fabrication steps <sup>1</sup>

**B. Disputed Terms**

<b>Claim Term / Asserted Claim(s)</b>	<b>Solas’s Construction</b>	<b>Defendants’ Construction</b>
“supply lines”  (claims 1, 13)	conductive lines supplying current or voltage	conductive lines, each supplying a driving current or voltage to a plurality of pixel circuits
“formed on said plurality of supply lines along said plurality of supply lines”  (claim 1)	formed on said plurality of supply lines over the length or direction of said plurality of supply lines	stacked on or making multiple contacts with said plurality of supply lines over the length of each supply line
“connected to said plurality of supply lines along said plurality of supply lines”  (claim 13)	connected to said plurality of supply lines over the length or direction of said plurality of supply lines	stacked on or making multiple contacts with said plurality of supply lines over the length of each supply line
“signal lines”  (claims 1, 13)	conductive lines supplying signals	conductive lines carrying data

<sup>1</sup> Solas, Apple, and HP are filing a joint motion adopting this construction, while also preserving the right of Apple and HP to appeal the construction based on the positions, record, and arguments made in *Solas OLED Ltd. v. LG Display Co., Ltd. et al.*, 6:19-CV-00236-ADA (W.D. Tex.)

<b>Claim Term / Asserted Claim(s)</b>	<b>Solas's Construction</b>	<b>Defendants' Construction</b>
"source"  (claims 1, 5, 12, 13, 17)	Plain and ordinary meaning	source electrode
"drain"  (claims 1, 5, 12, 13, 17)	Plain and ordinary meaning	drain electrode

#### **IV. U.S. PATENT NO. 7,499,042 ("’042 PATENT")**

The ’042 patent is asserted in *Solas v. HP* (6:19-cv-00631). The following terms / constructions for the ’042 patent apply only to that case and Solas and HP.

##### **A. Disputed Terms**

<b>Claim Term / Asserted Claim(s)</b>	<b>Solas's Construction</b>	<b>HP's Construction</b>
"selection period"  (claim 1)	time period during which a plurality of pixel circuits is selected	time duration in which a selected selection scan line is kept active
"sequentially selects said plurality of selection scan lines in each selection period"  (claim 1)	Plain and ordinary meaning	selects said plurality of selection scan lines one per each of a plurality of non-overlapping selection periods
"designating current"  (claim 1)	Plain and ordinary meaning, i.e., current designating a value corresponding to an image signal	current having a specified current value that is held constant
"current lines"  (claim 1)	Plain and ordinary meaning, i.e., conductive lines for carrying current	conductive lines, each connected to a plurality of pixel circuits and carrying current

**V. U.S. PATENT NO. 7,663,615 (“’615 PATENT”)**

The ’615 patent is asserted in *Solas v. HP* (6:19-cv-00631). The following terms/constructions for the ’615 patent apply only to that case and Solas and HP.

**A. Agreed Terms**

<b>Claim Term / Asserted Claim(s)</b>	<b>Agreed Construction</b>
“gradation”  (claims 11, 13)	level
“light emission control section”  (claim 11)	drive transistor

**B. Disputed Terms**

<b>Claim Term / Asserted Claim(s)</b>	<b>Solas’s Construction</b>	<b>HP’s Construction</b>
“the operation”  (claim 11)	Plain and ordinary meaning, not indefinite. Within the claim phrase “a drive voltage for making the light emission control section perform the operation,” the term “the operation” refers to “generating a light emission drive current having a predetermined current value in accordance with the electric charges accumulated in the electric charge accumulating section and supplying the light emission drive current to the light emission element.”	Indefinite
“precharge operation”	Plain and ordinary meaning	Indefinite

Claim Term / Asserted Claim(s)	Solas's Construction	HP's Construction
"writing control section"  (claim 11)	Plain and ordinary meaning, i.e., circuit section that controls writing	a transistor that controls the writing of both the gradation sequence signal and the precharge voltage from a data line to the charge accumulating section
"data lines"  (claim 11)	Plain and ordinary meaning, i.e., conductive lines for supplying information	conductive lines, each connected to and carrying data to a plurality of light emission drive circuits

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

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